
**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

XIONGEN JIAO, an individual, QIANJU JIAO, an individual, ZHONGHUA YU, an individual, JIATONG YU, an individual, PENGFEI ZHOU, an individual, XUANMEI ZHOU, an individual,

Plaintiffs,

vs.

NINGBO XU, an individual, and LCL COMPANY LLC, a Texas Limited Liability Company,

Defendants,

And

DONGTAI INVESTMENT GROUP, LLC, a Texas Limited Liability Company.

Nominal Defendant.

**PLAINTIFFS' COUNSEL'S
UNOPPOSED MOTION TO
WITHDRAW**

Case No.: 4:19-CV-01848

Judge: Hon. Keith P. Ellison

Yaou Li and his law firm MOSAIC Paradigm Law Group PC ("Plaintiffs' Counsel") file their Unopposed Motion to Withdraw and request this Court to enter an order allowing them to withdraw as counsel of record for Plaintiffs XIONGEN JIAO, QIANJU JIAO, ZHONGHUA YU, JIATONG YU, PENGFEI ZHOU, and XUANMEI ZHOU (collectively, "Plaintiffs") and would respectfully show the Court as follows:

On December 10, 2018, Plaintiffs hired Plaintiffs' Counsel¹ by executing a written contract to provide legal services (the "Agreement") in connection with the civil litigation and associated

¹ Plaintiffs initially hired Yaou Li and Nguyen and Chen, LLP. After Nguyen and Chen, LLP dissolved in August 2022, Plaintiffs hired Yaou Li and MOSAIC Paradigm Law Group PC to continue representing them.

activities arising out of Defendants' actions and conducts impacting Plaintiffs. On May 25, 2022, Plaintiffs and Plaintiffs' Counsel mutually agreed to expand the scope of legal services to include representation of Plaintiffs as the members of Dongtai Investment Group, LLC ("Dongtai") for Dongtai's dissolution.

Under the Agreement, Plaintiffs agreed that they would jointly and severally pay Plaintiffs' Counsel for the legal services rendered in accordance with the fee schedule. In November 2022, Plaintiffs stopped paying Plaintiffs' Counsel for the legal services. On March 6, 2023, after 6 months of not paying their legal fees, Plaintiffs instructed Plaintiffs' Counsel to stop working in writing. Upon receiving the instruction, Plaintiffs' Counsel reached an agreement with Plaintiffs that they would stop representing Plaintiffs in all matters and would withdraw as counsel of record for Plaintiffs. Plaintiffs approved Plaintiffs' withdrawal as counsel for Plaintiffs. *See* Exhibit A – Declaration of Qianju Jiao.

No scheduling order or trial date has been set. No party will be harmed or prejudiced if this Court grants the relief requested herein. Defendants are unopposed to this Motion as evidenced by the Certificate of Conference set forth below.

Plaintiffs' last known home address, telephone number, and email address are as follows:

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Jiatong Yu

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Xuanmei Zhou

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Pengfei Zhou

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See Exhibit A, ¶ 4.

Plaintiffs Qianju Jiao, Xiongen Jiao, Zhonghua Yu, Jiatong Yu, Pengfei Zhou, and Xuanmei Zhou can be served through Qianju Jiao via email at qianjujiao@outlook.com. *Id.* at ¶ 5.

CERTIFICATE OF CONFERENCE

The undersigned counsel certifies he has conferred with counsel for Defendants regarding the relief sought in this motion on March 15, 2023. Defendants are unopposed to this motion to withdraw.

/s/ Yaou Li

Yaou Li

PRAYER

WHEREFORE, PREMISES CONSIDERED, Yaou Li and his law firm, MOSAIC Paradigm Law Group PC, hereby respectfully request that the Court enters an order granting their Unopposed Motion to Withdraw and for such other and further relief, at law or in equity, to which they may show themselves justly entitled.

DATED this 17th day of March 2023.

Respectfully submitted,

MOSIAC PARADIGM LAW GROUP PC

By: /s/ Yaou Li

Yaou Li

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State Bar No. 24102093

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ATTORNEY FOR PLAINTIFFS

CERTIFICATE OF SERVICE

The undersigned hereby certify that the foregoing document is being filed on this 17th day of March 2023 via the Court's CM/ECF filing system, which will serve a copy electronically on all counsel of record.

/s/ Yaou Li
Yaou Li